



CTIA

Building The Wireless Future™
Cellular Telecommunications & Internet Association

January 17, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

Re: Ex Parte Presentation
IB Docket No. 01-185; ET Docket No. 95-18; ET Docket No. 00-258

Dear Ms. Dortch:

On January 16, 2003, the Cellular Telecommunications & Internet Association ("CTIA") represented by Diane Cornell, Vice President for Regulatory Policy, Dan Swearingen, consultant to CTIA, Don Brittingham, Director- Spectrum Policy, Verizon Wireless, Charla Rath, Director of Spectrum & Public Policy, Verizon Wireless, Kathryn Zachem, Wilkinson Barker Knauer, LLP, Jim Bugel, Executive Director, Government Affairs, Cingular Wireless, Andrew Clegg, Senior Manager of Wireless Strategy, Cingular Wireless, and Steve Sharkey, Director, Spectrum and Standards Strategy, Motorola, met with Bryan Tramont, Senior Legal Advisor to Chairman Powell, Bruce Franca, Deputy Chief of the Office of Engineering and Technology, Rick Engelman, Chief Engineer of the International Bureau, and representatives from the Wireless Telecommunications Bureau, including Kathleen Ham, Deputy Chief, Cathy Seidel, Associate Bureau Chief/ Chief of Staff, Tom Stanley, Chief Engineer, and Marty Liebman, Senior Engineer, to discuss interference issues related to the pending Mobile Satellite Service/Ancillary Terrestrial Component proceedings. Specifically, the parties discussed the potential for MSS operations in the 1900-2025 MHz band to interfere with PCS operations in the adjacent band. The issues were discussed in the attached outline.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Diane J. Cornell

Diane J. Cornell



cc: Bryan Tramont
Bruce Franca
Rick Engelman
Kathleen Ham
Cathy Seidel
Tom Stanley
Marty Liebman



MSS/ATC Interference Issues Relevant to 1930-1990 MHz PCS Band

- The operation of MSS/ATC mobile transmitters in spectrum that is close to 1990 MHz will cause substantial interference to PCS mobile receivers.
 - Out-of-band emissions from MSS/ATC transmitters will cause harmful interference in-band to PCS receivers; and
 - PCS receivers will not be able to sufficiently reject in-band MSS/ATC emissions without adequate separation.
- The potential for harmful interference can be eliminated or reduced by imposing a stricter out-of-band emissions (“OOBE”) limit on MSS/ATC transmitters and ensuring that PCS and MSS/ATC operations are adequately separated in frequency.
- PCS equipment is designed to ensure that emissions into the PCS receive band (1930-1990 MHz) do not exceed -80 dBm. The CMRS parties believe that MSS/ATC out-of-band emissions should be required to comply with this standard in the 1930-1990 MHz band.
- The potential for harmful interference is expected to be greater in areas with higher user densities, such as urban and suburban areas, because the potential for MSS/ATC and PCS customers to be in close proximity to one another is greater.
- Assuming that MSS operators are authorized to employ ATC and will utilize terrestrial base stations to provide service in higher density areas, the potential for harmful interference is expected to be greater from ATC operations.
- Sufficient separation between PCS and MSS/ATC operations is required. A minimum of 20 MHz is required to separate PCS and ATC operations, based on current PCS mobile receiver design. As a result, the CMRS parties proposed that no ATC mobile transmissions be permitted below 2010 MHz. No restrictions were proposed for ATC base transmissions in the 1990-2025 MHz band.
- Importantly, the international allocation for MSS ends at 2010 MHz. Thus, the restriction of ATC mobile operations to spectrum above 2010 MHz will promote the use of internationally aligned spectrum for MSS.
- Over time, improved filtering in PCS mobile receivers could reduce the required separation between PCS and ATC on a going-forward basis for new handsets.